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January 31, 2018

Stephen Healy
Mechanical Engineer
EPA OTAQ Compliance Division
Diesel Engine Compliance Center

Stephen,

We have addressed the items you requested in your email dated February 14, 2017 to allow us to install engines in truck glider kits.

Butler Machinery Company has 816 employees as of December 2017, which is below the level of 1,500 required by 13 CFR 121.201 using the NAICS code 336120.

Butler Machinery Company is solely owned by the following individuals, who are all family.

Dan Butler	38%
Nathan Butler	13%
Payton Thimjon	4%
Mason Thimjon	4%
Isaac Butler	4%
Twylah Blotsky	14%
Jim Blotsky	1%
Jacob Blotsky	11%
Joshua Blotsky	11%

Butler Machinery has one wholly owned subsidiary, which is North Central Rental and Leasing. We also have ownership interests in MidStates VRS LLC and Rural Tower Network.

Butler Machinery Company has employed the following number of people for each of the last three years as of December 31

2017-816
2016-858
2015-1014

Butler Machinery Company has installed engines in the following number of truck glider kits each of the following years

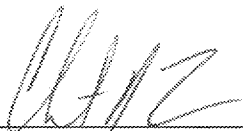
2010

2011

2012

2013

2014



Christopher Lee, Chief Financial Officer